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June 30, 2022

Via Email

Honorable Michael B. Kaplan
Chief United States Bankruptcy Judge
United States Bankruptcy Court
Clarkson S. Fisher US Courthouse
402 East State Street
Trenton, NJ 08608

**Re: LTL Management LLC
Case No. 21-30589 (MBK)
LTL Management LLC v. Those Parties Listed on Appendix A
Adv. Pro. No. 21-03032(MBK)
Our File No.: 24987.001**

Dear Judge Kaplan:

This firm serves as local counsel to the Talc Creditors Committee ("TCC") in the above referenced matters.

We are in receipt of the Court's Order dated June 27, 2022 [docket #2609] adjourning all matters scheduled for hearing on July 6th to July 26, 2022, with the exception of the "revisiting" of the application of the automatic stay and imposition of a preliminary injunction with regard to the non-debtor parties (the "PI Issues").

The Court's Order further indicates that the argument on the PI Issues would be held by zoom on July 6th and would be confined to no more than 2 hours and 15 minutes.

It is the view of the TCC that the PI Matters are so important as to warrant in person argument and it is likely that the arguments on this issue will consume more than 2 hours and 15 minutes. We also believe that resolution of the PI Issues is intertwined with other matters on the July 26th calendar, including the Debtor's request for estimation. Based upon the foregoing, the TCC respectfully requests that the Court adjourn the PI Matters to July 26 and afford ample time for these matters to be fully argued.

We have reached out to counsel for the Debtor and to the two other firms who have independently moved that the stay and preliminary injunction as to non-debtors be terminated. The two other moving parties have advised that they do not object to the adjournment of the PI Matters to July 26. The Debtor opposes the claimants' request to adjourn the July 6, 2022 hearing on the continuation of the automatic stay and preliminary injunction. The Debtor believes that a ruling by this Court on the claimants' requests to modify or lift the automatic stay and preliminary injunction could assist the ongoing mediation efforts. In



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addition, the Court's *Order Adjourning Matters* [docket #2609] entered on June 27, 2022 adjourns various matters that were set for the July 6th hearing but did not adjourn oral argument on continuation of the automatic stay and preliminary injunction. It thus appears to the Debtor that the Court's Order reflects a preference by the Court to proceed with those matters in advance of the July 26, 2022 hearing.

Based upon the foregoing, the TCC respectfully requests that the Court adjourn the PI Matters to July 26, 2022 and set the deadline for parties to reply to the Debtor's response to July 19, 2022.

In light of the fact that our reply would otherwise need to be filed by July 5th at noon, we respectfully request the Court's prompt attention to this matter.

We thank the Court for its ongoing courtesies.

Respectfully yours,

GENOVA BURNS LLC

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